

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AMOURA BRYAN

Plaintiff,

v.

THE CITY OF NEW YORK, MAYOR ERIC L. ADAMS,
FORMER MAYOR BILL DEBLASIO,
COMMISSIONER ASHWIN VASAN, MD, PHD
DEPARTMENT OF HEALTH AND MENTAL HYGIENE,
DEPARTMENT OF EDUCATION, AND DOES 1-20

Defendants.

INDEX No.: 1:22 CV 02234-EK-LB

**DECLARATION OF
JO SAINT-GEORGE**

Jo Saint-George, pursuant to 28 U.S.C. § 1746, does hereby state under penalty of perjury that the foregoing is true and correct.

1. I am an attorney at the Women of Color Law Center (Law Center), and all counsel of record (Counsel of Record) for Plaintiff Amoura Bryan in above-captioned matter.
2. I submit this declaration in support of my motion to withdrawal of the Law Center and all counsel of record as counsel for Plaintiff Amoura Bryan.
3. I have had limited success in maintaining contact with Ms. Bryan, who for the last year has not worked in the State of New York which is frustrating my ability to confer and represent her in a meaningful manner.
4. I personally advised orally (via text messages) and in electronic emails to Ms. Bryan that Counsel of Record would be constrained to withdraw as their counsel in the event that Ms. Bryan failed to cooperate with counsel. In fact, one of the provisions to the retainer agreement with Ms. Bryan that she had earlier signed provides for withdrawal as counsel in

the event Ms. Bryan failed to communicate or cooperate with counsel. In my opinion, my client is not communicating and cooperating with counsel.

5. The last known address for Ms. Bryan is:

5 Boston Court
Newark, NY 07103
6. Ms. Bryan has outstanding litigation fees related to her case that Counsel of Record have not received.
7. Counsel of Record therefore seek to assert a retaining lien against Ms. Bryan's litigation file, to secure payment under the existing retainer agreement at some point in time in the future.
8. Accordingly, and for all of the reasons stated above, I do not believe Counsel of Record can continue to represent Ms. Bryan in this lawsuit in accordance with our professional obligations and I, therefore, respectfully request permission to withdraw as counsel of record in this action.
8. A copy of the Notice of Motion to Withdraw as Counsel together with this accompanying Declaration, has been mailed by U.S. Postal Services to the address referenced in paragraph 5 above, and served by electronic mail to Defense counsel for the City of New York and the City of New York Department of Education.

Dated: October 16, 2024

/s/ Jo Saint - George
Jo Saint-George, Esq.
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